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George Sorich and Paul Samsel*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHRISTOPHER WILDER,

Plaintiff,

v.

SORICH, et al.,

Defendants.

Case No. 3:20-cv-00263-CLB

**MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S
MOTION FOR AN ORDER
COMPELLING DISCOVERY
(ECF NO. 25)
(Third Request)**

Defendants George Sorich and Paul Samsel, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and David A. Bailey, Deputy Attorney General, request this Court grant an extension of time to respond to Plaintiff Christopher Wilder's Motion for an Order Compelling Discovery (ECF No. 25) ("Motion"). This request is made and based on the attached points and authorities, the papers and pleadings on file herein, and such other and further information as this Court may deem appropriate.

MEMORANDUM OF POINTS AND AUTHORITIES

Courts have inherent powers to control their dockets, *see Ready Transp., Inc. v. AAR Mfg, Inc.*, 627 F.3d 402, 404 (citations omitted), and to "achieve the orderly and expeditious disposition of cases." *Chambers v. NASCO, Inc.*, 501 U.S. 32, 43 (1991) "Such power is indispensable to the court's ability to enforce its orders, manage its docket, and regulate insubordinate [] conduct. *Id.* (citing *Mazzeo v. Gibbons*, No. 2:08-cv01387-RLH-PAL, 2010 WL 3910072, at *2 (D.Nev.2010)).

1 LR IA 6-1 discusses requests for continuances. The rule states:

2 (a) A motion or stipulation to extend time must state the reasons
3 for the extension requested and must inform the court of all
4 previous extensions of the subject deadline the court granted.
5 (Examples: "This is the first stipulation for extension of time to
6 file motions." "This is the third motion to extend time to take
7 discovery.")

8 This is the third request and is requested for good cause. Defendants are finalizing
9 certain discovery responses that will be sent to Wilder that should narrow, if not eliminate,
10 the issues this Court would need to consider from Wilder's Motion. Counsel for the
11 Defendants met-and-conferred with Wilder on April 22, 2022 and negotiated an extension
12 of time to respond to the Motion so Wilder could review Defendants' responses and
13 produced documents with a next meet-and-confer call scheduled for May 12, 2022. Counsel
14 for Defendants met with Wilder at NNCC on May 17, 2022 to review and discuss discovery
15 issues, available documentation and media, and possible resolution of this case. Wilder
16 and Defendants agreed to a two-week extension for Defendants' response to the Motion up
17 to and including May 31, 2022, to provide time for the parties to attempt to resolve the
18 pending discovery dispute or settle the case. Defendants now request this Court extend
19 Defendants' deadline to submit a response to the Motion from May 17, 2022 to May 31,
20 2022.

21 Therefore, the Defendants request an extension of time to file their response to Wilder's
22 Motion, which would then be due on **May 31, 2022**.

23 DATED this 17th day of May 2022.

24 AARON D. FORD
25 Attorney General

26 No further extensions of time
27 will be granted.

28 IT IS SO ORDERED.

Dated: May 18, 2022

By: /s/ David A. Bailey
DAVID A. BAILEY, Bar No. 13661
Deputy Attorney General

Attorneys for Defendants


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF CONFERENCE

Undersigned Counsel for Defendants certifies that he and Plaintiff Christopher Wilder conducted an in-person meet-and-confer on May 17, 2022, regarding discovery in this matter, extending the time for which Defendants would have to respond to Wilder's Motion, and a proposed settlement. Wilder is not opposed to the extension of time Defendants seek herein to respond to the Motion.

/s/ David A. Bailey
DAVID A. BAILEY, Bar No. 13661

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 17th day of May 2022, I caused to be served, a true and correct copy of the foregoing, **MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION FOR AN ORDER COMPELLING DISCOVERY (ECF NO. 25) (Third Request)**, by U.S. District Court CM/ECF Electronic Filing on:

Christopher Wilder, #83600
Northern Nevada Correctional Center
P.O. Box 7000
Carson City, NV 89702
lawlibrary@doc.nv.gov

/s/ Karen Easton
An employee of the Office
of the Attorney General